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**MEMO ENDORSED**

**COPY**

MANHATTAN OFFICE  
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The application is ☒ granted.  
 — denied.

May 23, 2012

VIA FAX (914-390-4298)

Hon. Edgardo Ramos  
 United States District Court, SDNY  
 300 Quarropas Street  
 White Plains, NY 10601-4150

Edgardo Ramos, U.S.D.J.

Dated: 5/24/12

White Plains, New York

Deadline for conducting  
 non-expert depositions is  
 extended to September  
 15, 2012.

Re: Coble et al. v. Cohen & Slomowitz, LLP et al.  
 Index: 11-CV-01037 (ER)(GAY)

Your Honor:

This office, along with co-counsel, Klein, Kavanagh, Costello, LLP, represents Plaintiffs in the above referenced class action, brought under the Fair Debt Collection Practices Act, 15 U.S.C. 1692, *et seq.* On 5/15/12, Plaintiffs submitted a pre-motion letter to the Court regarding what Plaintiffs contend is Defendants' unjustified refusal to produce the Collection, Correspondence and Court files of the non-named class members. Defendants responded by letter dated 5/8/12, and the dispute regarding production of these documents was subsequently referred to Magistrate Yanthis by Order dated 5/14/12. Magistrate Yanthis has scheduled a telephone conference on the issue for 6/15/12.

I write on behalf of all parties to request that the deadline for conducting non-expert depositions, currently set for June 1<sup>st</sup>, be extended until 60 days after Magistrate Yanthis decides the discovery dispute. This will allow the depositions to take place after any additional production ordered by the Court has occurred. Magistrate Yanthis' Chambers has indicated that, because only the discovery dispute itself has been referred to the Magistrate, this joint request regarding the deposition deadline should be addressed to Your Honor.

There are currently eleven noticed depositions in this matter: Defendants have noticed depositions for each of the three named Plaintiffs as well as two non-parties; Plaintiffs have noticed four of the defendants and two non-parties. One of Defendants' non-party depositions is noticed to take place in Florida. The parties are confident that they can complete these eleven depositions prior to the extended deadline.

Respectfully,

Daniel A. Schlanger

cc: T. Leghorn, Esq.; J. Alward, Esq.; O. Klein, Esq.;  
 J. McGowan, Esq.; E. Shollenberger, Esq.

